

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**PARALLEL IRON, LLC**

**Plaintiff,**

**v.**

**ADCONION MEDIA INC., *ET AL.***

**Defendants.**

**Civil Action No. 11-799-RGA**

**Jury Trial Demanded**

**STIPULATION OF EARLY DISCOVERY LIMITED TO  
PLAINTIFF'S LICENSES AND SETTLEMENT AGREEMENTS**

IT IS HEREBY STIPULATED AND AGREED by Plaintiff Parallel Iron, LLC ("Plaintiff") and Defendant EMC Corporation ("EMC"), by and through the undersigned counsel, and subject to the approval of the Court, as follows:

In connection with preliminary dispute-resolution discussions, EMC has asked for copies of Plaintiff's prior licenses and settlement agreements. Plaintiff wishes to accommodate EMC's request but is constrained due to confidentiality provisions in the agreements. In order to facilitate this production, Plaintiff and EMC have agreed and hereby seek the Court's authorization to commence early discovery limited to production of Plaintiff's licenses and/or settlement agreements. This discovery, if permitted, shall be limited to a single Rule 34 request for production from EMC to Plaintiff, in which EMC may ask Plaintiff to produce copies of its licenses and/or settlement agreements. Production responsive to said request shall be made solely to EMC and subject to Local Rule 26 with access limited to outside counsel of record for EMC and no more than two EMC in-house counsel. Further discovery in the case will occur in the normal course in accordance with the Court's normal schedule and procedures.

January 27, 2012

BAYARD, P.A.

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*ATTORNEYS FOR DEFENDANT  
EMC CORPORATION*

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2012.

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United States District Judge